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STIPULATED MOTION AND [PROPOSED]-ORDER EXTENDING EXPERT DEADLINES – 1

Case No.: 2:25-cv-00159-JNW

Honorable Jamal N Whitehead

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE

PUSEY FAMILY, LLC,

Plaintiff,

VS.

OHIO SECURITY INSURANCE COMPANY, a foreign corporation,

Defendant.

No. 2:25-cv-00159-JNW

STIPULATED MOTION AND [PROPOSED] ORDER EXTENDING EXPERT DEADLINES

NOTE FOR CONSIDERATION: JULY 7, 2025

The parties in the matter stipulate and agree to move the Court for an Order continuing the expert disclosure deadline for approximately six weeks to obtain additional information in discovery and to obtain expert opinions, for good cause shown. The parties have exchanged initial disclosures and they are proceeding with diligence to schedule and complete discovery depositions, in order to provide a fuller record of discovery in connection with any expert reports that are to be submitted pursuant to Fed. R. Civ. P. 26(a)(2).

The parties have not requested to alter any deadlines previously, and the proposed amendments do not require moving the trial date. Therefore, the parties respectfully move this Court for and propose the following pre-trial deadlines:

FORSBERG & UMLAUF, P.S.
ATTORNEYS AT LAW
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1	Case Event	Current Deadline	New Deadline
2	Disclosure of expert testimony under FRCP 26(a)(2)	July 7, 2025	August 18, 2025
3	Disclosure of rebuttal expert	Within 30 days after the	Within 14 days after the
4	testimony under FRCP 26(a)(2)	other party's expert disclosure	other party's expert disclosure
5			
6	All other deadlines shall remain as identified in Dkt. No. 12.		
7	RESPECTFULLY SUBMITTED this 7th day of July, 2025.		
8	FORSBERG & UMLAUF, P.S.		
9	s/ Michael D. Handler Michael D. Handler WSDA #25654		
10	Michael D. Handler, WSBA #25654 Daniel L. Syhre, WSBA # 34158		
11	401 Union Street, Suite 1400 Seattle, WA 98101		
12	Tel. 206-689-8500 mhandler@foum.law		
13	dsyhre@foum.law Attorneys for Defendant		
		, ,	rejenuum
14	and		
15	BEST LAW, PLLC		
16	s/Ryan M. Best		

Ryan M. Best, WSBA #33672 905 W. Riverside Ave., Suite 409 Spokane, WA 99201 Tel. 509-624-4422 ryan.best@bestlawspokane.com Attorneys for Plaintiff

STIPULATED MOTION AND [PROPOSED] ORDER EXTENDING EXPERT DEADLINES – 2

Case No.: 2:25-cv-00159-JNW

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ORDER 2 Pursuant to the foregoing stipulation of the parties, the Court directs the Clerk to enter a minute order reflecting, reflecting the amended deadline for expert disclosures on August 18, 2025, with rebuttals to follow within 14 days or by September 8, 2025. All other deadlines will 5 remain as ordered. 6 IT IS SO ORDERED. 7 Dated this 14th day of July , 2025. 8 9 THE HONORABLE Jamal N. Whitehead 10 United States District Court Judge 11 12 13 14 15 16 17 18 19 20 21 22 23

STIPULATED MOTION AND [PROPOSED]-ORDER EXTENDING EXPERT DEADLINES – 3 Case No.: 2:25-cv-00159-JNW

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